

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

SABA HASHEM, individually and as a member of, and derivatively on behalf of, D'Angelo and Hashem, LLC,

Plaintiff / Defendant-in-Counterclaim,

V.

Civ. Action No. 16-cv-12383-IT

STEPHEN D'ANGELO, individually and as a member of D'Angelo & Hashem, LLC, and D'Angelo Law Group; D'ANGELO LAW GROUP, LLC, and D'ANGELO AND HASHEM, LLC,

Defendants / Plaintiffs-in-Counterclaim

JENNIFER M. CARRION,

Intervention-Plaintiff,

V.

SABA HASHEM, STEPHEN D'ANGELO,
D'ANGELO & HASHEM, LLC, D'ANGELO
LAW GROUP, LLC

Intervention-Defendants.

Amended Scheduling Order

TALWANI, D.J.

This Scheduling Order is intended to provide a reasonable timetable for discovery and motion practice in order to help ensure a fair and just resolution of this matter without undue expense or delay.

Timetable for Discovery and Motion Practice

Pursuant to Rule 16(b) of the Federal Rules of Civil Procedure and Local Rule 16.1(f), it is hereby ORDERED that:

1. **Fact Discovery –**
 - a. Fact discovery is closed except as set forth herein.

- b. Defendant shall produce the additional documents identified in the deposition referenced during the September 5, 2018, status conference, no later than September 19, 2018.
 - c. Any motion to compel such documents shall be filed no later than September 26, 2018.
2. **Expert Discovery.**
- a. Trial expert(s) that the disclosing party anticipates using to support his, her or its claims or defenses must be designated and the information contemplated by Fed. R. Civ. P. 26(a)(2) must be disclosed by December 7, 2018.
 - b. Trial expert(s) that the disclosing party anticipates using to rebut or respond to an opposing party's experts must be designated and the information contemplated by Fed. R. Civ. P. 26(a)(2) must be disclosed by January 7, 2019.
 - c. Depositions of trial experts shall be completed by February 7, 2019.
3. **Dispositive Motions.**
- a. Intervention-Plaintiff's motion for summary judgment must be filed by November 15, 2018.
 - i. Intervention-Defendants' oppositions to Intervention-Plaintiff's motion for summary judgment, and any cross motions for summary judgment as to claims made by Intervention-Plaintiff must be filed by December 6, 2018.
 - ii. Intervention-Plaintiff's reply and opposition to any cross-motions for summary judgment must be filed by December 27, 2018.
 - iii. Intervention-Defendants' reply must be filed by January 10, 2019.
 - b. Any dispositive motions relating to claims between Plaintiff and Defendants must be filed by March 15, 2019.
 - i. Any opposition to Plaintiff or Defendants' motions for summary judgment must be filed by April 5, 2019.
 - ii. Any reply to oppositions must be filed by April 19, 2019.

Procedural Provisions

4. **Extension of Deadlines.** Motions to extend or modify deadlines will be granted only for good cause shown. All motions to extend shall contain a brief statement of the reasons for the request; a summary of the discovery, if any, that remains to be taken; and a specific date when the requesting party expects to complete the additional discovery, join other parties, amend the pleadings, or file a motion.
5. **Motions to Compel or Prevent Discovery.** Except for good cause shown, motions to compel discovery, motions for protective orders, motions to quash, motions to strike discovery responses, and similar motions must be filed no later than seven days after the close of fact discovery or the close of expert discovery, whichever deadline is relevant. If additional discovery is compelled by the court after the relevant deadline has passed, the court may enter such additional orders relating to discovery as may be appropriate.

6. **Status Conferences.** The court has scheduled a status conference after (or close to) the close of fact discovery for case management purposes. Any party who reasonably believes that a status conference will assist in the management or resolution of the case may request one from the court upon reasonable notice to opposing counsel.
7. **Additional Conferences.** Upon request of counsel, or at the court's own initiative, additional case-management or status conferences may be scheduled.
8. **Early Resolution of Issues.** The court recognizes that, in some cases, early resolution of one or more preliminary issues may remove a significant impediment to settlement or otherwise expedite resolution of the case. Counsel are encouraged to confer and jointly advise the court of any such issues.
9. **Pretrial Conference.** Lead trial counsel are required to attend any pretrial conference.
10. **Discovery Disputes.** Counsel encountering a discovery dispute are encouraged to request a conference with the court before filing a discovery motion.

Indira Talwani

United States District Judge

By: /s/Carolina DaSilva

Deputy Clerk

Date: September 7, 2018